

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

ROCKWELL AUTOMATION, INC. and ROCKWELL  
AUTOMATION TECHNOLOGIES, INC.,

Plaintiffs,

-against-

WAGO CORPORATION and WAGO  
KONTAKTECHNIK GmbH & CO. KG,

Defendants.

Case No. 3:10-CV-718-WMC

**PLAINTIFFS' PROPOSED VOIR DIR QUESTIONS**

Plaintiffs Rockwell Automation, Inc. and Rockwell Automation Technologies, Inc. submit the following proposed voir dire questions to be asked of prospective jurors at the trial of this action:

**Knowledge of Parties and Counsel**

1. In this case, plaintiffs Rockwell Automation, Inc. and Rockwell Automation Technologies, Inc. ("Rockwell") claim that defendants Wago Corporation and Wago Kontakttechnick GmbH & Co. KG ("Wago") are infringing four patents owned by Rockwell. The patents relate to something called a programmable logic controller or PLC which is used to control machinery in an industrial setting. Wago denies that it is infringing on Rockwell's patents and claims that some of Rockwell's patents are invalid.
2. Has anyone heard of the four parties I have identified?
3. Is anyone currently employed by or have a family member employed by any of the four parties I have identified?
4. Was anyone ever employed by or have a family member employed by any of the four parties I have identified?
5. Does anyone own a financial interest in any of these parties?
6. Has anyone bought or used products manufactured or sold by any of the parties?

7. The parties may call a number of witnesses to testify and may refer to the names of other people during the course of the trial. Please let me know whether you know any of the following people:

Jens Adler  
Thomas Albers  
Thomas Artmann  
Gregory Bell  
Richard Bero  
Steven Blech  
Ronald Bliss  
Kurt Braun  
John Caspers  
Allan Cribbs  
Mark DeCramer  
Jeffery Hamilton  
Sven Hohorst  
Cindy Hollenbeck  
Richard Hooper  
David Johnston  
James Kay  
William Kegley  
Werner Kositzke  
James Maclkledowney  
Gregory Majcher  
Robert Meeker  
Phil Murin  
Emmett Murtha  
Tracy Dean Norton  
Charles Norz  
Gregory Rinn  
Amy Rybacki  
Dan Schumacher  
Stuart Siegel  
Shelly Urdaneta  
David Vasko  
Peter Van Oudenaren  
Robert Vigil  
Thomas Volz  
Bernhard Werner  
Jeff Zacharias  
Arthur Zatarain

8. You will also hear the names of various lawyers and law firms representing the parties in this case. Please let me know whether you know any of the following lawyers or law firms:

Chadbourne and Parke LLP

Scott S. Balber

Paul J. Tanck

Lisa Schapira

Emily Abrahams

Michael Best & Friedrich LLP

Robert Cook

David L. Debruin

Giilberto Espinoza

John C. Scheller

Marschall J. Schmitt

### **Experience with Legal System**

9. Has anyone served as a juror before? (nature of case, timing, verdict reached, foreperson)
10. Has anyone been a party to a lawsuit before? (nature of case, timing, outcome, feelings towards system)
11. Has anyone worked in a law enforcement or legal capacity or had an immediate family member working in such capacity?
12. Has anyone been a witness in a lawsuit? (nature of case, outcome, feelings towards system).

### **Specialized Knowledge/Experience**

13. Does anyone have any experience as an engineer? (nature of experience, when)
14. Has anyone worked in a factory? (what capacity, nature of experience)
15. Has anyone ever seen or used an industrial controller? (circumstances)
16. Does anyone work for a company that uses industrial controllers?
17. Has anyone had any experience with inventions or patents, either directly or through a close family member?
18. Has anyone had any dealings with the United States Patent and Trademark Office?

**Finance/Accounting Experience**

19. Does anyone have experience in finance, economics or accounting?
20. If the evidence in this case supports an award of tens of millions of dollars, would you have any difficulty or even hesitate to award this amount?
21. Is there any other matter which you believe should be called to the court's attention which you believe may prevent you from rendering a fair and impartial verdict based solely on the evidence and my instructions as to the law?

Dated: September 13, 2012

/s/ Paul J. Tanck

Scott S. Balber (admitted in W.D. Wis.)  
Paul J. Tanck (admitted in W.D. Wis.)  
Lisa Schapira (admitted in W.D. Wis.)  
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COUNSEL FOR PLAINTIFFS ROCKWELL  
AUTOMATION, INC.  
and ROCKWELL AUTOMATION  
TECHNOLOGIES, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of September, 2012 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

I declare under the penalty of perjury under the law of the United States that the foregoing is true and correct.

Dated: September 13, 2012

/s/ Lisa Schapira

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